

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 22-CV-11553

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NATALIE ANDERSON,  
Plaintiff,

v.

MARRIOTT INTERNATIONAL, INC.,  
RESIDENCE INN NASHUA (formerly  
known as RESIDENCE INN BY  
MARRIOTT located in NASHUA and is  
also the DBA of NASHUA TS LODGING,  
LLC); TRUE NORTH HOTEL GROUP  
AND JENNIFER BROOKS,  
Defendants.

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**DEFENDANT JENNIFER BROOKS'**  
**SEPARATE MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

Defendant Jennifer Brooks (“Ms. Brooks”), by and through its undersigned counsel, respectfully moves this Court to dismiss Plaintiff’s Complaint under Rule 12(b)(2) and Rule 12(b)(5) of the Federal Rules of Civil Procedure. As set forth more specifically in the accompanying Memorandum of Law, Plaintiff’s claims against Ms. Brooks should be dismissed for lack of personal jurisdiction and insufficiency of service of process.

The Defendant,  
JENNIFER BROOKS,  
By Her Attorneys,

MORRISON MAHONEY LLP

*/s/ Amy B. Yarbro*

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Amy B. Yarbro, BBO # 686665  
ayarbro@morrisonmahoney.com  
Gabriela Archilla, BBO#706925  
garchilla@morrisonmahoney.com  
250 Summer Street  
Boston, MA 02210  
(617) 439-7500

**CERTIFICATE OF SERVICE**

I, Amy B. Yarbro, attorney for the defendants, hereby certify that I have this day served the foregoing to all parties of record in this action by e-mail to:

Natalie Anderson  
679 Washington Street, Suite #8-206  
Attleboro, Massachusetts 02703  
Liberty\_6@msn.com

Dated: September 28, 2022 Attorney: */s/ Amy B. Yarbro*  
Amy B. Yarbro